

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	22-11885
Ladeyiha Reed)		
)	Chapter:	Chapter 13
Debtor(s))		
)	Judge:	Donald R. Cassling

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on **October 27, 2022 at 9:30 a.m.**, I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, and present the **MOTION TO EXTEND THE AUTOMATIC STAY**, a copy of which is attached

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is **161 414 7941** and the passcode is **619**. The meeting ID and passcode can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ David Kosk

David Kosk
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55 E. Monroe Street #3400
Chicago, Illinois 60603
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No:	22-11885
Ladeyiha Reed)		
)	Chapter:	Chapter 13
Debtor(s))		
)	Judge:	Donald R. Cassling

CERTIFICATE OF SERVICE

I, David Kosk, hereby certify that I served a copy of this notice along with the aforementioned document upon the listed parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, from 55 E. Monroe, Suite 3400, Chicago, Illinois, on October 18, 2022 before 5:30 p.m.

By: /s/ David Kosk
David Kosk

LIST OF PARTIES SERVED

Thomas H. Hooper, 55 E. Monroe St. #3850, Chicago, IL 60603

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Ladeyiha Marshey Reed, PO Box 368707, Chicago, IL 60636

Kathryn A. Klein c/o Riezman Berger PC, 7700 Bonhomme, 7th Fl, St. Louis, MO 63105

Timothy R. Yueill c/o Law Offices of Ira T. Nevel, 175 N. Franklin, Chicago, IL 60606

ALL CREDITORS ON THE ATTACHED LIST

Ladeyiha Marshey Reed
PO Box 368707
Chicago, IL 60636

Advocate Medical Group
Bankruptcy Department
75 Remittance Dr., Ste. 1019
Chicago IL 60675

AVANT
Attn: Bankruptcy Dept.
222 N LaSalle St Ste 160
Chicago IL 60601

Capital One
Bankruptcy Department
PO Box 30285
Salt Lake City UT 84130

City of Chicago Bureau Parking
Bankruptcy Dept/City Clerk
121 N. LaSalle St
Room 107
Chicago IL 60602

Comcast Cable
Bankruptcy Department
1701 John F. Kennedy Blvd
Philadelphia PA 19103

Comenitycapital/Mycash
Attn: Bankruptcy Dept.
Po Box 182120
Columbus OH 43218

Credit One Bank
Bankruptcy Dept
6801 S Cimarron Rd
Las Vegas NV 89113

DEPT OF EDUCATION/NELN
Attn: Bankruptcy Dept.
121 S 13Th St
Lincoln NE 68508

Farmers Insurance
Bankruptcy Dept.
PO Box 948
Aurora IL 60507-0948

FEB DESTINY/GF
Attn: Bankruptcy Dept.
15220 Nw Greenbrierpkwy
Beaverton OR 97006

First Premier BANK
Attn: Bankruptcy Dept.
601 S Minnesota Ave
Sioux Falls SD 57104

FMA Alliance, LTD
PO Box 2409
Houston TX 77252

FNB Omaha
Attn: Bankruptcy Dept.
Po Box 3412
Omaha NE 68103

Holy Cross Hospital
1500 South Fairfield Ave
Chicago IL 60608

Illinois Eye Institute
3241 S Michigan Ave
Chicago IL 60616

Illinois State Toll Hwy Auth
Attn: Legal Dept - Bob Lane
2700 Ogden Ave.
Downers Grove IL 60515-1703

LVNV Funding
Bankruptcy Department
355 S Main St Ste 300-D
Greenville SC 29601

MCYDSNB
3911 S Walton Walker Blvd
Dallas TX 75265

Medicredit
PO Box 1629
Hazelwood MO 63043

Mercy Medical Group
PO Box 1279
Oaks PA 19456

Monterey Financial Svc.
4095 Avenida De La Plata
Oceanside CA 92056

Nationwide Credit & Collection
Bankruptcy Department
815 Commerce Dr., Ste. 270
Oak Brook IL 60523

Onemain
Attn: Bankruptcy Dept.
Po Box 1010
Evansville IN 47706

Oportun/PROGRESO FINAN
Attn: Bankruptcy Dept.
3201 Dallas Pkwy Ste 700
Frisco TX 75034

Peoples Gas
Bankruptcy Department
200 E. Randolph Dr.
Chicago IL 60601

Portfolio Recovery Associates LLC
Bankruptcy Dept
PO Box 41067
Norfolk VA 23541

SELF FINANCIAL/LEAD BA
Attn: Bankruptcy Dept.
1801 Main St
Kansas City MO 64108

SELF/ATLANTIC CAPITAL
Attn: Bankruptcy Dept.
945 E Paces Ferry Rd Ne
Atlanta GA 30326

Sprint
Bankruptcy Dept.
PO Box 7949
Overland Park KS 66207

SPS Portfolio
Bankruptcy Department
PO Box 65250
South Salt Lake UT 84165

Syncb/CAR CARE SYN CAR
Attn: Bankruptcy Dept.
Po Box 965036
Orlando FL 32896

Syncb/JCP
Attn: Bankruptcy Dept.
Po Box 965007
Orlando FL 32896

Syncb/PPC
Attn: Bankruptcy Dept.
Po Box 530975
Orlando FL 32896

TBOM/ATLS/Aspire
Attn: Bankruptcy Dept.
5 Concourse Pkwy Ste 400
Atlanta GA 30328

TD AUTO Finance
Attn: Bankruptcy Dept.
Po Box 9223
Farmington MI 48333

Jefferson Capital Systems LLC
Bankruptcy Dept.
PO Box 7999
Saint Cloud MN 56302

TD BANK USA/Targetcred
Attn: Bankruptcy Dept.
Po Box 673
Minneapolis MN 55440

Upgrade INC
Attn: Bankruptcy Dept.
275 Battery St Fl 23
San Francisco CA 94111

Visitation Catholic School
900 W Garfield Blvd
Chicago IL 60609

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re: Ladeyiha Reed Debtor,)))))	Case No: 22-11885 Chapter: Chapter 13 Judge: Donald R. Cassling
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MOTION TO EXTEND THE AUTOMATIC STAY

NOW COMES the Debtor, Ms. Ladeyiha Reed (the “Debtor”), by and through her attorneys, Geraci Law LLC, to present her **Motion to Extend the Automatic Stay** pursuant to 11 U.S.C. §§. 105 and 362(c)(3), and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 10/14/2022.
3. The Debtor filed a previous petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code on 01/10/2019, case number 19-00768. The case was dismissed on 09/15/2022 for failure to make plan payments.
4. The Debtor’s circumstances have changed as follows (see affidavit attached as Exhibit A):
 - a. In the previous case, the Debtor fell behind on her Chapter 13 plan payments when she temporarily stopped receiving social security income for her adult disabled daughter.
 - b. The Debtor has since resolved the issue with the social security income and is now again receiving said income enabling her to afford the plan payments on this case.

Additionally, this Chapter 13 case proposes a 100% dividend to general unsecured claims.

5. The Debtor is filing this case in good faith.
6. The schedules I and J of the previous case have been attached as Exhibit B, the schedules I and J of the current case have been attached as Exhibit C.

WHEREFORE, the Debtor, Ms. Ladeyiha Reed, prays this Court enter an order:

1. Extending the Automatic Stay as to all creditors until such time as the stay is lifted by a party in interest as to that party only following notice and a hearing or such time as this case is dismissed or discharged; and
2. Any other relief that this Court deems just and proper.

Respectfully submitted,

/s/ David Kosk
David Kosk

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960